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88053

May 2, 1990

Mr. Charles D'Amico
NJ Department of Environmental Protection
Division of Hazardous Waste Management
Bureau of Hazardous Waste Regulation and Classification
CN 028
Trenton, NJ 08625-0028

Re: Waste Soil Classification Sampling Plan
K. Hovnanian Co.; University Heights Project
Newark, NJ
JMS Project # 88053

Dear Mr. D'Amico:

The purpose of this letter is to propose a modified waste characterization sampling plan for petroleum contaminated soils excavated at the University Heights redevelopment project area in Newark, New Jersey. Our original waste classification request was submitted on March 26, 1990. That request included analytical results for four (4) composite samples of the waste soil. The total volume of waste soil involved is approximately 15,500 cubic yards.

The waste soil was the result of leakage from a group of underground storage tanks discovered during the early construction/site preparation phase of the project. The project site is located in a seriously blighted portion of the Central Ward of Newark. This part of the city sustained extensive destruction during the 1968 riots and never recovered. Most of the buildings damaged during the riots were leveled by the city. Underground storage tanks associated with the buildings were generally ignored during this site clearing and leveling activity. Now, as redevelopment has begun these tanks and the contaminated soil associated with them are being removed voluntarily by the K. Hovnanian Company, the project developer.

Most of the tanks discovered are in the 500 to 1,000-gallon capacity range and were used to store heating oil. However,, the tanks that caused the 15,500 cubic yards of contaminated soil currently under evaluation are believed to have held gasoline.

The tanks were very old (greater than 50 years) based on their unusual design, construction and placement. There was no surficial evidence of the presence of the tanks, such as fill ports or vents. Because the buildings had been removed long ago and the city records contained little pertinent information, it was impossible to determine the tanks original purposes. The tanks contained mostly water and what appeared to be weathered gasoline. The presence of gasoline constituents in the contaminated soil leads us to conclude that the material stored was gasoline.

Since the soil was originating from Essex County, no in-state disposal site was available, and preparations were made to dispose of the soil out-of-state. However, the expense of out-of-state disposal made this infeasible. More recently, the Hackensack Meadowlands Development Commission has made us aware that it may be willing to accept this material for use as cover, providing that it is classified as ID-27 and approved for use as cover by NJDEP. The analytical results submitted previously were for samples collected during the early part of excavation. They came from some of the most heavily contaminated soil encountered in the area immediately surrounding the tanks. The samples were originally intended for approval for out-of-state disposal.

Based on our telephone conversation of May 1, 1990, we propose to collect additional samples to help the Department make its determination as to the classification of the waste soil. The soil is currently stockpiled in one (1) area on site. The stockpile covers an area of approximately 40,000 square feet. A grid will be superimposed over the stockpile which will divide it into 30 squares of approximately 1,300 square feet surface area. Five (5) discrete samples will be collected from various depths in each square. These discrete samples will be composited into a single sample for each square. This will result in the collection of 30 separate waste characterization samples, each representing approximately 500 cubic yards of soil.

Each sample will be analyzed for the following parameters:

EP-Toxicity Metals (Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver)

Sulfide Reactivity

Cyanide Reactivity

Total Petroleum Hydrocarbons

pH

Percent Solids

Corrosivity

Ignitability

Polychlorinated Biphenyls (PCBs)

The samples will be collected in accordance with NJDEP approved procedures as outlined in the attached methodology summary. All analytical work will be performed by an NJDEP-certified analytical laboratory. Chain-of-custody documentation and all appropriate quality assurance/quality control documentation will be supplied.

Results for these samples will be tabulated and supplied to the Department as a supplement to the original classification request.

A check in the amount of $200.00 has been enclosed to cover the Sampling Plan review fee. If you have any questions regarding this plan, please call me at your convenience.

Sincerely,

Michael McGowan
Senior Geologist

MM:cp

Enclosure

cc: Mr. Glenn Ward, K. Hovnanian Co.